

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2021-349-E

In the matter of:)	
)	
Joint Petition of Duke Energy Carolinas, LLC)	PETITION TO INTERVENE OF
and Duke Energy Progress, LLC to Request the)	CAROLINA INDUSTRIAL GROUP
Commission to Hold a Joint Hearing with the)	FOR FAIR UTILITY RATES II & III
North Carolina Utilities Commission to)	
Develop Carbon Plan)	

The Carolina Industrial Group for Fair Utility Rates II (hereinafter, “CIGFUR II”) and the Carolina Industrial Group for Fair Utility Rates III (hereinafter, “CIGFUR III”) (collectively, “CIGFUR”), pursuant to Rule 103-825 of the Commission’s Rules of Practice and Procedure, respectfully submits this petition to intervene in the above-captioned proceeding currently pending before the South Carolina Public Service Commission (the “Commission”). In support of its petition, CIGFUR states as follows:

1. CIGFUR II is an unincorporated association of large, high-load factor industrial customers with facilities located in the North Carolina jurisdictional service territory of Duke Energy Progress, LLC (hereinafter, “DEP”).
2. CIGFUR III is an unincorporated association of large, high-load factor industrial customers with facilities located in the North Carolina jurisdictional service territory of Duke Energy Carolinas, LLC (hereinafter, “DEC”).
3. As direct purchasers of electric power from DEP, the CIGFUR II member companies have direct, substantial, and pecuniary interests in the outcome of this proceeding.

4. As direct purchasers of electric power from DEC, the CIGFUR III member companies have direct, substantial, and pecuniary interests in the outcome of this proceeding.
5. CIGFUR's participation in this docket will bring to this proceeding the important perspective and critical knowledge and insight of some of DEP's and/or DEC's largest North Carolina ratepayers. Moreover, CIGFUR was an active participant in the legislative stakeholder process that culminated in the introduction of House Bill 951 (S.L. 2021-165), which serves as the basis for the petition filed in the above-captioned proceeding.
6. The name and principal address of the Petitioner are:

Carolina Industrial Group for Fair Utility Rates
c/o, Christina D. Cress, Esq.
Bailey & Dixon, LLP
434 Fayetteville St., Suite 2500
P.O. Box 1351
Raleigh, NC 27602-1351
7. Pursuant to Rule 103.804(5) of the Commission's Rules of Practice and Procedure, CIGFUR is represented in this proceeding by local counsel who is duly licensed to practice law in the State of South Carolina, and requests that undersigned counsel be added to the official service list in this docket:

James H. Goldin
Google LLC
SC Bar No. 100092
151 Meeting St., Ste. 600
Charleston, SC 29401
(650) 224-9297
jameygoldin@google.com

8. CIGFUR consents to service via electronic mail and requests that all communications regarding this docket be directed to CIGFUR's counsel of record, with copies to:

Christina D. Cress
Of Counsel
Bailey & Dixon, LLP
434 Fayetteville St., Suite 2500
P.O. Box 1351
Raleigh, NC 27602-1351
(919) 607-6055
ccress@bdixon.com

9. No other party is capable of adequately representing or protecting CIGFUR's unique interests in this proceeding. As such, CIGFUR has a vital interest in the subject matters at issue in this proceeding and should be granted full intervention rights as a party of record to this proceeding.
10. Granting CIGFUR's request to intervene in this proceeding is in the public interest and is consistent with South Carolina law and the regulations and policies of the Commission in encouraging maximum public participation in its proceedings.
11. Pursuant to Rule 103-804 of the Commission's Rules of Practice and Procedure, CIGFUR states that it is represented by the undersigned counsel in this proceeding.

WHEREFORE, for the reasons set forth herein, Petitioner CIGFUR prays that it be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this the 2nd day of December, 2021.

Christina D. Cress¹
N.C. State Bar No. 45963
Bailey & Dixon, LLP
E-mail: ccress@bdixon.com
434 Fayetteville St., Ste. 2500
Raleigh, NC 27601
Telephone: (919) 607-6055

By: /s/ James H. Goldin
James H. Goldin (SC Bar No. 100092)
E-mail: jameygoldin@google.com
151 Meeting Street, Suite 600
Charleston, SC 29401
Telephone: (650) 224-9297

¹ Christina D. Cress will seek leave and move to appear *pro hac vice* in this docket after submitting her application to the Supreme Court of South Carolina.

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2021-349-E

In the matter of:)	
)	
Joint Petition of Duke Energy Carolinas, LLC)	CERTIFICATE OF SERVICE
and Duke Energy Progress, LLC to Request the)	
Commission to Hold a Joint Hearing with the)	
North Carolina Utilities Commission to)	
Develop Carbon Plan)	

This is to certify that I have caused to be served this day one copy of the **Petition to Intervene of CIGFUR** to the persons named below at the addresses set forth via electronic mail and/or e-filing:

Nanette Edwards
Office of Regulatory Staff
nedwards@ors.sc.gov

Andrew M. Bateman, Counsel
Office of Regulatory Staff
abateman@ors.sc.gov

Camal O. Robinson, Deputy General Counsel
Duke Energy Carolinas, LLC and Duke Energy Progress, LLC
Camal.Robinson@duke-energy.com

Frank R. Ellerbe III, Counsel
Robinson Gray Stepp & Laffitte, LLC
fellerbe@robinsongray.com

Vordman C. Traywick III, Counsel
Robinson Gray Stepp & Laffitte, LLC
ltraywick@robinsongray.com

Teresa Arnold, State Director, AARP
AARP South Carolina
tarnold@aarp.org

Richard L. Whitt
Whitt Law Firm, LLC
Richard@rlwhitt.law

John Burns
Carolinas Clean Energy Business Association
counsel@carolinasceba.com

Carri Grube Lybarker, Consumer Advocate and Administrator
South Carolina Department of Consumer Affairs
clybarker@scconsumer.gov

Roger P. Hall, Deputy Consumer Advocate
South Carolina Department of Consumer Affairs
rhall@scconsumer.gov

John H. Tiencken, Jr.
The Tiencken Law Firm, LLC
jtiencken@tienckenlaw.com

Christopher S. McDonald
The Tiencken Law Firm, LLC
cmcdonald@tienckenlaw.com

Charles L.A. Terreni
Terreni Law Firm, LLC
Charles.terreni@terrenilaw.com

Christopher R. Koon
ECSC
Chris.koon@ecsc.org

R. Taylor Speer
Turner, Padget, Graham & Laney, P.A.
tspeer@turnerpadget.com

Jeffrey W. Kuykendall
jwkuykendall@jwklegal.com

Peter H. Ledford, General Counsel
NCSEA
peter@energync.org

This the 2nd day of December, 2021.

/s/ James H. Goldin
James H. Goldin